Federal Communications Commission

Regarding comments on petitions to eliminate the 5 word per minute requirement for Amateur Radio licensing.

Reference:

RM-10805 through RM-10811

Dear Sirs or Madam:

I am very much in favor of moving the "state of the art" forward for Amateur Radio and technology as a whole. If there is a means of providing simple and effective emergency communications that CW currently provides then it clearly makes sense to do away with the CW requirement.

It is my opinion that CW still remains a viable means of operating a low power station in emergency situations on emergency power while still providing effective communications. Currently other means of communication require far more equipment and systems to provide the same capability (computers, interface hardware, etc). This equipment is far more difficult to get up and running and keep running under emergency/limited power conditions. I believe that this compromises one of the purposes of the Amateur Radio Service...which is to provide emergency communications.

Although dropping the CW requirement does not prevent the use of CW in emergencies, over time, I feel that not having required that members of the Amateur Service learn this skill, most, if not all will not study and learn this potentially necessary capability.

Another consideration regarding the requirement for CW for higher-class licenses is the need to ensure the people that enter into the amateur service are dedicated to its total purpose and not just convenient communications. There are several other services that the FCC has established for convenient communications purposes (CB, GMRS, etc). I believe the CW requirement tends to direct peoples decision-making process regarding amateur radio based upon their commitment to the total amateur service purpose and intent.

If the CW requirement were to be dropped from the study and testing for HF privileges; then I would be very much in favor of increasing the technical content of the tests in a graduated manner for each of the license classes to ensure applicants/licensee's are dedicated to the intent and purpose of the Amateur Radio Service and are capable of contributing to the advancement of the service. It is important to ensure that members of the Amateur community advance the state of the art of radio communications, as well as provide a trained corps of radio operators in support of our nation in times of need.

Thank you,

Ron Polluconi – KJ7IY Portland, Oregon